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**VIA ECF**

Hon. Valerie Caproni, U.S.D.J.  
U.S. District Court for Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

**Re: *In re Navidea Biopharmaceuticals Litigation***  
**Civil Action No.: 19-01578 (VEC)**

Dear Judge Caproni:

This law firm, along with Gregory Zimmer, Esq., represent defendant/counter-claimant Michael M. Goldberg in the aforementioned matter. In accordance with the direction provided by the Court in its Memo Endorsement dated April 5, 2024, the parties have conferred, and we respectfully submit this letter to inform the Court of the three mutually agreed-upon trial dates. The parties have concurred on the following dates in 2024: October 28, November 4, November 12, and November 18. We anticipate that the trial will span 4-5 days, inclusive of jury selection. If these dates conflict with the Court's trial schedule, the parties are prepared to further deliberate and suggest alternative dates.

We kindly request the Court to adjourn all other pretrial submission dates outlined in the Court's March 25, 2024 Order to align with the new trial date set by the Court. This will also give the parties time to discuss the possibility of settlement to resolve this matter amicably before burdening the Court with further filings.

We thank the Court for its continued courtesies and consideration.

Respectfully Submitted,

/s/ Jennifer Fiorica Delgado  
Jennifer Fiorica Delgado

cc: All counsel of record